

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF MISSISSIPPI**

IN RE: LAZEDRIA WILSON

CHAPTER 13

DEBTOR

CASE NO. 16-11494-JDW

RESPONSE TO TRUSTEE'S MOTION TO DISMISS [DOCUMENT NO. 58]

COMES NOW, Lazedria Wilson, by and through her attorney of record and in response to the Trustee's Motion To Dismiss and would show as follows:

The Debtor respectfully requests that her Chapter 13 not be dismissed. Debtor is attempting to catch up on her payments. Debtor respectfully requests her case not be dismissed and requests that any arrearage be added back into her plan.

WHEREFORE, PREMISES CONSIDERED, the Debtor requests that the court deny the Trustee's Motion To Dismiss and that she be allowed to catch up on her payments and for such other and further relief that this court deems just and proper under the circumstances.

RESPECTFULLY SUBMITTED,

/s/Robert H. Lomenick, Jr.
ROBERT H. LOMENICK, MSB #104186
ATTORNEY AT LAW
POST OFFICE BOX 417
HOLLY SPRINGS, MISSISSIPPI 38635
(662) 252-3224

CERTIFICATE OF SERVICE

I, Robert H. Lomenick Jr., Attorney for Debtor, do hereby certify that I have this day forwarded, a true and correct copy of the above and foregoing Response To Motion To Dismiss to the Debtor, either by electronic means or by United States Mail to the following:

**Locke Barkley
Chapter 13 Trustee
6360 I-55 North, Ste. 140
Jackson, Mississippi 39211**

**Office of U.S. Trustee
501 East Court Street, Suite 6-430
Jackson, Mississippi 39201**

This the 8th day of January, 2020.

/s/ Robert H. Lomenick, Jr.
ROBERT H. LOMENICK, JR.